

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

SYLVESTER JONES

PLAINTIFF

v.

CIVIL ACTION NO. \_\_\_\_\_

G.D. SEARLE, LLC, a subsidiary of  
PHARMACIA CORPORATION,  
a Foreign Corporation;  
MONSANTO COMPANY;  
PFIZER, INC., LINDSAY BURKES,  
RYAN HOOKER, WILLIAM SETH  
JOYNER, CHRISTOPHER POOLE,  
BRENT WATERS, STENNIS WELLS;  
and fictitious Defendants  
A, B, C and D being those persons, firms or  
corporations whose actions, inactions,  
fraudulent suppression, fraud, scheme to  
defraud and/or wrongful conduct caused  
or contributed to the Plaintiff's injuries and  
damages, and whose true names and identities  
are presently unknown to the Plaintiff but will  
be substituted by amendment when  
ascertained.

DEFENDANTS

AFFIDAVIT OF STENNIS WELLS

Stennis Wells, being duly sworn, deposes and says:

1. I am Stennis Wells and I currently reside in Mississippi. I have personal knowledge of the matters stated herein, and I am competent to make this affidavit.
  
2. I was formerly employed by Pfizer Inc. ("Pfizer") as a Pharmaceutical Representative until approximately July of 2000. I have never been employed by Pharmacia Corporation. I never detailed Celebrex® after July of 2000.



3. At all relevant times, I acted only in the ordinary course and scope of my employment as a Pharmaceutical Representative with respect to Celebrex®.

4. As a Pharmaceutical Representative, I visited physicians and healthcare providers' offices and provided them FDA-approved package inserts and other FDA-approved information about Pfizer's products, which is referred to as "detailing." My job was to make the physician aware of certain of Pfizer's products, so that he/she could consider whether to prescribe them for particular patients.

5. I am not a physician or pharmacist. The information and material I used to detail Pfizer's drugs was derived exclusively from education provided to me by Pfizer. Pfizer provided me with the FDA-approved package inserts and other FDA-approved information for the medications I detailed. I had no involvement in the development or preparation of package inserts for any drugs, and no control over content or other written warnings.

6. As part of my job duties, I detailed Celebrex®. However, I do not know whether I visited with or provided any information about Celebrex® to plaintiff's prescribing physician because plaintiff has not identified him/her.

7. At no time did I have any involvement with the design, manufacture, development or testing of the prescription medication Celebrex®, nor did I have any involvement in the FDA-approved package insert for Celebrex®.

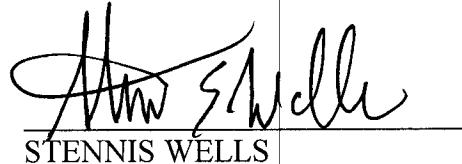
8. At no time did I sell, offer to sell, or take orders for the sale of Celebrex® to healthcare providers, physicians, or patients.

9. I have never made any representations to the general public concerning Celebrex®.

10. I have never met or spoken with the plaintiff, Sylvester Jones, and I have never sold or given Celebrex® to Sylvester Jones.

FURTHER AFFIANT SAITH NOT.

This 2 day of July, 2007.



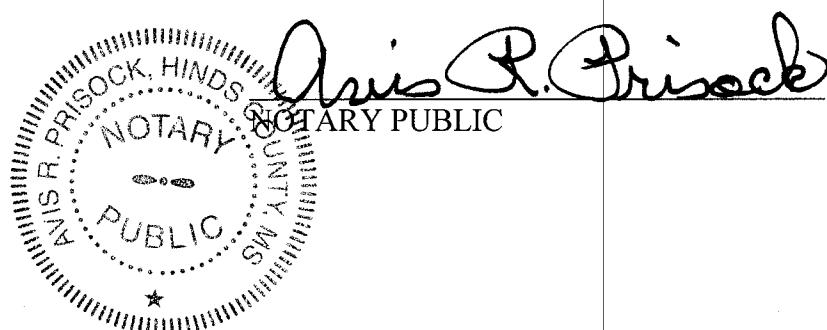
STENNIS WELLS

STATE OF MISSISSIPPI

COUNTY OF HINDS

PERSONALLY APPEARED BEFORE ME the undersigned authority in and for the state and county above, STENNIS WELLS, who, after being duly sworn, stated on oath that the above statements are true and correct to the best of his knowledge.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 2<sup>nd</sup> day of July, 2007.



MY COMMISSION EXPIRES:

MISSISSIPPI STATEWIDE NOTARY PUBLIC  
MY COMMISSION EXPIRES APRIL 26, 2008  
BONDED THRU STEGALL NOTARY SERVICE

*IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION*

*SYLVESTER JONES*

*PLAINTIFF*

*v.*

*CIVIL ACTION NO. \_\_\_\_\_*

*G.D. SEARLE, LLC, a subsidiary of  
PHARMACIA CORPORATION,  
a Foreign Corporation;  
MONSANTO COMPANY;  
PFIZER, INC., LINDSAY BURKES,  
RYAN HOOKER, WILLIAM SETH  
JOYNER, CHRISTOPHER POOLE,  
BRENT WATERS, STENNIS WELLS;  
and fictitious Defendants  
A, B, C and D being those persons, firms or  
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defraud and/or wrongful conduct caused  
or contributed to the Plaintiff's injuries and  
damages, and whose true names and identities  
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be substituted by amendment when  
ascertained.*

*DEFENDANTS*

**AFFIDAVIT OF LINDSAY BURKES**

Lindsay Burkes, being duly sworn, deposes and says:

1. I am Lindsay Burkes and I currently reside in Mississippi. I have personal knowledge of the matters stated herein, and I am competent to make this affidavit.
2. I have been employed by Pfizer Inc. ("Pfizer") as a Pharmaceutical Representative since July of 2003. I have never been employed by Pharmacia Corporation.
3. At all relevant times, I acted only in the ordinary course and scope of my

employment as a Pharmaceutical Representative with respect to Celebrex®.

4. As a Pharmaceutical Representative, I visit physicians and healthcare providers' offices and provide them FDA-approved package inserts and other FDA-approved information about Pfizer's products, which is referred to as "detailing." My job is to make the physician aware of certain of Pfizer's products, so that he/she can consider whether to prescribe them for particular patients.

5. I am not a physician or pharmacist. The information and material I use to detail Pfizer's drugs is derived exclusively from education provided to me by Pfizer. Pfizer provides me with the FDA-approved package inserts and other FDA-approved information for the medications I detail. I had no involvement in the development or preparation of package inserts for any drugs, and no control over content or other written warnings.

6. As part of my job duties, I have detailed Celebrex\_. However, I do not know whether I visited with or provided any information about Celebrex® to plaintiff's prescribing physician because plaintiff has not identified him/her.

7. At no time did I have any involvement with the design, manufacture, development or testing of the prescription medication Celebrex®, nor did I have any involvement in the FDA-approved package insert for Celebrex®.

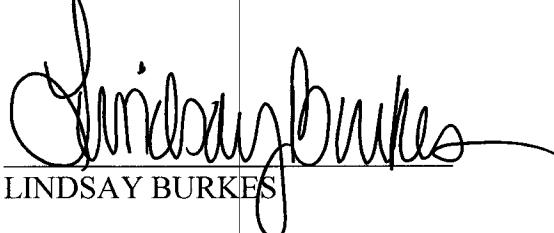
8. At no time did I sell, offer to sell, or take orders for the sale of Celebrex® to healthcare providers, physicians, or patients.

9. I have never made any representations to the general public concerning Celebrex®.

10. I have never met or spoken with the plaintiff, Sylvester Jones, and I have never sold or given Celebrex® to Sylvester Jones.

FURTHER AFFIANT SAITH NOT.

This 3<sup>rd</sup> day of July, 2007.



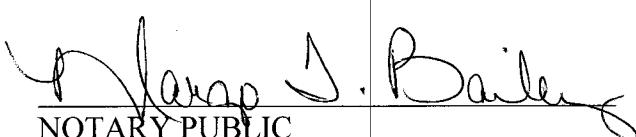
LINDSAY BURKES

STATE OF MISSISSIPPI

COUNTY OF PANOLA

PERSONALLY APPEARED BEFORE ME the undersigned authority in and for the state and county above, LINDSAY BURKES, who, after being duly sworn, stated on oath that the above statements are true and correct to the best of her knowledge.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 3<sup>rd</sup> day of July, 2007.



Karen J. Bailey  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

MISSISSIPPI STATEWIDE NOTARY PUBLIC  
MY COMMISSION EXPIRES DEC. 3, 2008  
BONDED THRU STEGALL NOTARY SERVICE

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

SYLVESTER JONES

PLAINTIFF

CIVIL ACTION NO.

G.D. SEARLE, LLC, a subsidiary of  
PHARMACIA CORPORATION,  
a Foreign Corporation;  
MONSANTO COMPANY;  
PFIZER, INC., LINDSAY BURKES,  
RYAN HOOKER, WILLIAM SETH  
JOYNER, CHRISTOPHER POOLE,  
BRENT WATERS, STENNIS WELLS;  
and fictitious Defendants

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ascertained.

DEFENDANTS

AFFIDAVIT OF WILLIAM SETH JOYNER

William Seth Joyner, being duly sworn, deposes and says:

1. I am William Seth Joyner and I currently reside in Tennessee. I have been a resident and citizen of Tennessee since May of 2004. I am not a resident of Mississippi. I have personal knowledge of the matters stated herein, and I am competent to make this affidavit.
2. I was formerly employed by Pfizer Inc. ("Pfizer") as a Pharmaceutical Representative until April of 2004.
3. At all relevant times, I acted only in the ordinary course and scope of my employment as a Pharmaceutical Representative with respect to Celebrex®.

WATKINS EAGER

005

4. As a Pharmaceutical Representative, I visited physicians and healthcare providers' offices and provided them FDA-approved package inserts and other FDA-approved information about Pfizer's products, which is referred to as "detailing." My job was to make the physician aware of certain of Pfizer's products, so that he/she could consider whether to prescribe them for particular patients.

5. I am not a physician or pharmacist. The information and material I used to detail Pfizer's drugs was derived exclusively from education provided to me by Pfizer. Pfizer provided me with the FDA-approved package inserts and other FDA-approved information for the medications I detailed. I had no involvement in the development or preparation of package inserts for any drugs, and no control over content or other written warnings.

6. As part of my job duties, I detailed Celebrex®. However, I do not know whether I visited with or provided any information about Celebrex® to plaintiff's prescribing physician because plaintiff has not identified him/her.

7. At no time did I have any involvement with the design, manufacture, development or testing of the prescription medication Celebrex®, nor did I have any involvement in the FDA-approved package insert for Celebrex®.

8. At no time did I sell, offer to sell, or take orders for the sale of Celebrex® to healthcare providers, physicians, or patients.

9. I have never made any representations to the general public concerning Celebrex®.

10. I have never met or spoken with the plaintiff, Sylvester Jones, and I have never sold or given Celebrex® to Sylvester Jones.

WATKINS EAGER

006

FURTHER AFFIANT SAITH NOT.

This 6<sup>th</sup> day of July, 2007.

W. SETH JOYNER  
WILLIAM SETH JOYNER

STATE OF ALABAMA

COUNTY OF Baldwin

PERSONALLY APPEARED BEFORE ME the undersigned authority in and for the state and county above, WILLIAM SETH JOYNER, who, after being duly sworn, stated on oath that the above statements are true and correct to the best of his knowledge.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 6 day of July, 2007.

Alex Harper  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

4/19/2011



**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**SYLVESTER JONES**

**PLAINTIFF**

v.

**CIVIL ACTION NO. \_\_\_\_\_**

**G.D. SEARLE, LLC, a subsidiary of  
PHARMACIA CORPORATION,  
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MONSANTO COMPANY;  
PFIZER, INC., LINDSAY BURKES,  
RYAN HOOKER, WILLIAM SETH  
JOYNER, CHRISTOPHER POOLE,  
BRENT WATERS, STENNIS WELLS;  
and fictitious Defendants**

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or contributed to the Plaintiff's injuries and  
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ascertained.**

**DEFENDANTS**

**AFFIDAVIT OF CHRISTOPHER POOLE**

Christopher Poole, being duly sworn, deposes and says:

1. I am Christopher Poole and I currently reside in Mississippi. I have personal knowledge of the matters stated herein, and I am competent to make this affidavit.
2. I was formerly employed by Pharmacia Corporation ("Pharmacia") as a Pharmaceutical Representative until February of 2007. At some time during my employment, Pfizer Inc. acquired Pharmacia but I am no longer employed by either entity.
3. At all relevant times, I acted only in the ordinary course and scope of my employment as a Pharmaceutical Representative with respect to Celebrex®.

4. As a Pharmaceutical Representative, I visited physicians and healthcare providers' offices and provided them FDA-approved package inserts and other FDA-approved information about Pharmacia's products, which is referred to as "detailing." My job was to make the physician aware of certain of Pharmacia's products, so that he/she could consider whether to prescribe them for particular patients.

5. I am not a physician or pharmacist. The information and material I used to detail Pharmacia's drugs was derived exclusively from education provided to me by Pharmacia. Pharmacia provided me with the FDA-approved package inserts and other FDA-approved information for the medications I detailed. I had no involvement in the development or preparation of package inserts for any drugs, and no control over content or other written warnings.

6. As part of my job duties, I detailed Celebrex®. However, I do not know whether I visited with or provided any information about Celebrex® to plaintiff's prescribing physician because plaintiff has not identified him/her.

7. At no time did I have any involvement with the design, manufacture, development or testing of the prescription medication Celebrex®, nor did I have any involvement in the FDA-approved package insert for Celebrex®.

8. At no time did I sell, offer to sell, or take orders for the sale of Celebrex® to healthcare providers, physicians, or patients.

9. I have never made any representations to the general public concerning Celebrex®.

10. I have never met or spoken with the plaintiff, Sylvester Jones, and I have

never sold or given Celebrex® to Sylvester Jones.

FURTHER AFFIANT SAITH NOT.

This 2nd day of July, 2007.



CHRISTOPHER POOLE

STATE OF MISSISSIPPI

COUNTY OF BOLIVAR

PERSONALLY APPEARED BEFORE ME the undersigned authority in and for the state and county above, CHRISTOPHER POOLE, who, after being duly sworn, stated on oath that the above statements are true and correct to the best of his knowledge.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 2nd day of July, 2007.



NOTARY PUBLIC

MY COMMISSION EXPIRES:

MISSISSIPPI STATEWIDE NOTARY PUBLIC  
MY COMMISSION EXPIRES MARCH 9, 2008

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**SYLVESTER JONES**

**PLAINTIFF**

v.

**CIVIL ACTION NO. \_\_\_\_\_**

**G.D. SEARLE, LLC, a subsidiary of  
PHARMACIA CORPORATION,  
a Foreign Corporation;  
MONSANTO COMPANY;  
PFIZER, INC., LINDSAY BURKES,  
RYAN HOOKER, WILLIAM SETH  
JOYNER, CHRISTOPHER POOLE,  
BRENT WATERS, STENNIS WELLS;  
and fictitious Defendants  
A, B, C and D being those persons, firms or  
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be substituted by amendment when  
ascertained.**

**DEFENDANTS**

**AFFIDAVIT OF RYAN HOOKER**

Ryan Hooker, being duly sworn, deposes and says:

1. I am Ryan Hooker and I currently reside in Mississippi. I have personal knowledge of the matters stated herein, and I am competent to make this affidavit.
2. I was formerly employed by Pfizer Inc. ("Pfizer") as a Pharmaceutical Representative until April of 2005. I have never been employed by Pharmacia Corporation.
3. At all relevant times, I acted only in the ordinary course and scope of my employment as a Pharmaceutical Representative with respect to Celebrex®.

4. As a Pharmaceutical Representative, I visited physicians and healthcare providers' offices and provided them FDA-approved package inserts and other FDA-approved information about Pfizer's products, which is referred to as "detailing." My job was to make the physician aware of certain of Pfizer's products, so that he/she could consider whether to prescribe them for particular patients.

5. I am not a physician or pharmacist. The information and material I used to detail Pfizer's drugs was derived exclusively from education provided to me by Pfizer. Pfizer provided me with the FDA-approved package inserts and other FDA-approved information for the medications I detailed. I had no involvement in the development or preparation of package inserts for any drugs, and no control over content or other written warnings.

6. As part of my job duties, I detailed Celebrex\_. However, I do not know whether I visited with or provided any information about Celebrex® to plaintiff's prescribing physician because plaintiff has not identified him/her.

7. At no time did I have any involvement with the design, manufacture, development or testing of the prescription medication Celebrex®, nor did I have any involvement in the FDA-approved package insert for Celebrex®.

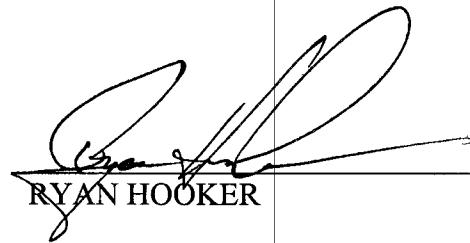
8. At no time did I sell, offer to sell, or take orders for the sale of Celebrex® to healthcare providers, physicians, or patients.

9. I have never made any representations to the general public concerning Celebrex®.

10. I have never met or spoken with the plaintiff, Sylvester Jones, and I have never sold or given Celebrex® to Sylvester Jones.

FURTHER AFFIANT SAITH NOT.

This 3<sup>rd</sup> day of July, 2007.



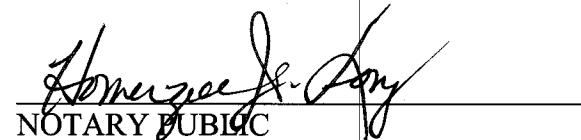
RYAN HOOKER

STATE OF MISSISSIPPI

COUNTY OF LEE

PERSONALLY APPEARED BEFORE ME the undersigned authority in and for the state and county above, RYAN HOOKER, who, after being duly sworn, stated on oath that the above statements are true and correct to the best of his knowledge.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 3<sup>rd</sup> day of July, 2007.



NOTARY PUBLIC

MY COMMISSION EXPIRES:

Mississippi Statewide Notary Public  
My Commission Expires 4-25-08

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**SYLVESTER JONES**

**PLAINTIFF**

**v.**

**CIVIL ACTION NO. \_\_\_\_\_**

**G.D. SEARLE, LLC, a subsidiary of  
PHARMACIA CORPORATION,  
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PFIZER, INC., LINDSAY BURKES,  
RYAN HOOKER, WILLIAM SETH  
JOYNER, CHRISTOPHER POOLE,  
BRENT WATERS, STENNIS WELLS;**

**and fictitious Defendants**

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ascertained.**

**DEFENDANTS**

**AFFIDAVIT OF BRENT WATERS**

Brent Waters, being duly sworn, deposes and says:

1. I am Brent Waters and I currently reside in Mississippi. I have personal knowledge of the matters stated herein, and I am competent to make this affidavit.
2. I was formerly employed by G.D. Searle LLC/Pharmacia Corporation/Pfizer Inc. (hereinafter collectively "Pfizer") as a Pharmaceutical Representative until March of 2007.
3. At all relevant times, I acted only in the ordinary course and scope of my employment as a Pharmaceutical Representative with respect to Celebrex®.

4. As a Pharmaceutical Representative, I visited physicians and healthcare providers' offices and provided them FDA-approved package inserts and other FDA-approved information about Pfizer's products, which is referred to as "detailing." My job was to make the physician aware of certain of Pfizer's products, so that he/she could consider whether to prescribe them for particular patients.

5. I am not a physician or pharmacist. The information and material I used to detail Pfizer's drugs was derived exclusively from education provided to me by Pfizer. Pfizer provided me with the FDA-approved package inserts and other FDA-approved information for the medications I detailed. I had no involvement in the development or preparation of package inserts for any drugs, and no control over content or other written warnings.

6. As part of my job duties, I detailed Celebrex®. However, I do not know whether I visited with or provided any information about Celebrex® to plaintiff's prescribing physician because plaintiff has not identified him/her.

7. At no time did I have any involvement with the design, manufacture, development or testing of the prescription medication Celebrex®, nor did I have any involvement in the FDA-approved package insert for Celebrex®.

8. At no time did I sell, offer to sell, or take orders for the sale of Celebrex® to healthcare providers, physicians, or patients.

9. I have never made any representations to the general public concerning Celebrex®.

10. I have never met or spoken with the plaintiff, Sylvester Jones, and I have never sold or given Celebrex® to Sylvester Jones.

FURTHER AFFIANT SAITH NOT.

This 2<sup>nd</sup> day of July, 2007.



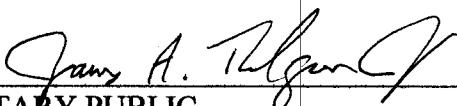
BRENT WATERS

STATE OF MISSISSIPPI

COUNTY OF LAMAR

PERSONALLY APPEARED BEFORE ME the undersigned authority in and for the state and county above, BRENT WATERS, who, after being duly sworn, stated on oath that the above statements are true and correct to the best of his knowledge.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 2<sup>nd</sup> day of July, 2007.



James A. Rodgers, Jr.  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

NOTARY PUBLIC STATE OF MISSISSIPPI AT LARGE  
MY COMMISSION EXPIRES: March 9, 2011  
BONDED THRU NOTARY PUBLIC UNDERWRITERS

